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June 18, 2019

Hon. Judith C. McCarthy, U.S.M.J.
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: Barbini, et al v. First Niagara Bank, N.A. et al.
7:16-cv-07887-NSR

Dear Judge McCarthy:

Attached, please find a subpoena for third party witness Lura Hess Bechtel to appear and be deposed. Ms. Bechtel has declined to appear voluntarily for her deposition. Plaintiffs have located three addresses within the United States that we believe are suitable for valid service of process upon Ms. Bechtel.

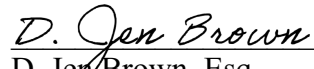
Accordingly plaintiffs respectfully request that the court *so order* the attached subpoena for service upon Ms. Bechtel at the following addresses.

74 Irving Place
Buffalo, NY 14201-1521

34 Park St. Apt
Buffalo, NY 14201-2021

140 Pearl St
Buffalo, New York 14202

Respectfully submitted,


D. Jen Brown, Esq.

cc: Frank Birchfield, Esq. (by ECF)
Counsel for defendants Key Bank N.A., et.al

Melissa Cohen, Esq. (by ECF)
Counsel for defendant Hugh Lawless

Brooke D. Youngwirth, Esq. (by ECF)
Counsel for plaintiff Claudia Barbini
